

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

EDGAR MERCADO SIERRA

DEBTOR

CASE NO. 13-03627-ESL
CHAPTER 13

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

TO THE HONORABLE COURT:

NOW COMES, EDGAR MERCADO SIERRA, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated October 14, 2015, herewith and attached to this motion.
2. This Plan modification is filed to cure Chapter 13 Plan arrears owed to the Trustee.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)(2)(b)

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

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Post confirmation modification of chapter 13 Plan
Case no. 13-03627-ESL13

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 14th day of October, 2015.

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699 FAX NO 787-746-5294
EMAIL: rfigueroa@rfclawpr.com

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 3:13-bk-3627

MERCADO SIERRA, EDGAR

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

- The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee directly by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
- The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 10/14/2015 <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION		<input type="checkbox"/> AMENDED PLAN DATED: Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other									
I. PAYMENT PLAN SCHEDULE <table border="1"> <tr> <td>\$ 250.00 x 5 = \$ 1,250.00</td> <td>\$ 0.00 x 4 = \$ 0.00</td> <td>\$ 299.00 x 1 = \$ 299.00</td> <td>\$ 315.00 x 14 = \$ 4,410.00</td> </tr> <tr> <td>\$ 0.00 x 5 = \$ 0.00</td> <td>\$ 378.00 x 31 = \$ 11,718.00</td> <td colspan="2">TOTAL: \$ 17,677.00</td> </tr> </table> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: _____</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input type="checkbox"/> Other:</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ 17,677.00</p>		\$ 250.00 x 5 = \$ 1,250.00	\$ 0.00 x 4 = \$ 0.00	\$ 299.00 x 1 = \$ 299.00	\$ 315.00 x 14 = \$ 4,410.00	\$ 0.00 x 5 = \$ 0.00	\$ 378.00 x 31 = \$ 11,718.00	TOTAL: \$ 17,677.00		II. DISBURSEMENT SCHEDULE <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <input type="checkbox"/> Trustee pays secured ARREARS: Cr. # _____ Cr. # _____ Cr. # _____ \$ _____ \$ _____ \$ _____ <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. RELIABLE FINANCIAL Cr. # _____ Cr. # _____ \$ 9,565.40 \$ _____ <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. # _____ Cr. # _____ Cr. # _____ \$ _____ \$ _____ \$ _____ <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: 5. <input type="checkbox"/> Other: 6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. # _____ Cr. # _____ Cr. # _____ \$ _____ \$ _____ \$ _____ Unsecured Claims otherwise receive PRO-RATA disbursements. <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) Additional Attorney's Fees: \$350.00 payment for the services rendered in connection to debtor(s)' post confirmation plan and related procedures for approval, pursuant to R. 2016 (f)(3). Priority claim: \$1,338.11 (Department of Treasury, claim 4-3). Debtor(s) to provide auto insurance upon maturity to RELIABLE thru Eastern America Insurance Company. Late filed claims filed by creditors will receive no distribution. Debtor reserves the right to object claims after plan confirmation.</p>	
\$ 250.00 x 5 = \$ 1,250.00	\$ 0.00 x 4 = \$ 0.00	\$ 299.00 x 1 = \$ 299.00	\$ 315.00 x 14 = \$ 4,410.00								
\$ 0.00 x 5 = \$ 0.00	\$ 378.00 x 31 = \$ 11,718.00	TOTAL: \$ 17,677.00									
<p>Signed: /s/ EDGAR MERCADO SIERRA Debtor</p> <p>Joint Debtor</p>											

Label Matrix for local noticing

0104-3

Case 13-03627-ESL13

District of Puerto Rico

Old San Juan

Wed Oct 14 21:21:49 AST 2015

US Bankruptcy Court District of P.R.

Jose V Toledo Fed Bldg & US Courthouse

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

RELIABLE FINANCIAL SERVICES

PO BOX 21382

SAN JUAN, PR 00928-1382

AT&T

5407 ANDREWS HWY

MIDLAND, TX 79706-2851

TREASURY DEPARTMENT

C/O DORIS E HERNANDEZ DIAZ, ESQ.

DEPARTMENT OF JUSTICE

PO BOX 9020192

SAN JUAN, PR 00902-0192

Department of Treasury-

Bankruptcy Section (Suite 1504)

235 Ave. Arterial Hostos

San Juan Puerto Rico 00918-1451

EASTERN AMERICA INSURANCE COMPANY

PO BOX 9023862

SAN JUAN, PR 00902-3862

LIBERTY CABLEVISION-PR

PO BOX 8759

CAGUAS, PR 00726-8759

MIDLAND FUNDING LLC

CITIBANK

PO BOX 268941

OKLAHOMA, OK 73126-8941

PR ACQUISITIONS

PO BOX 194499

SAN JUAN, PR 00919-4499

Palisades Collection, LLC

Vativ Recovery Solutions LLC, dba SMC

As Agent For Palisades Collection, LLC

PO Box 40728

Houston TX 77240-0728

ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS CHAPTER 13 TRUS

PO BOX 9024062

SAN JUAN, PR 00902-4062

EDGAR MERCADO SIERRA

BONNEVILLE TERRACE

F 20 2 STREET

CAGUAS, PR 00725-5806

MONSITA LECAROZ ARRIBAS

OFFICE OF THE US TRUSTEE (UST)

OCHOA BUILDING

500 TANCA STREET SUITE 301

SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO

PO BOX 186

CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d) RELIABLE FINANCIAL SERVICES, INC.

PO BOX 21382

SAN JUAN PR 00928-1382

End of Label Matrix

Mailable recipients 14

Bypassed recipients 0

Total 14